

1 ***Paving the path for implementation of clinical genomic***  
2 ***sequencing globally - Are we ready?***

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6 **Abstract**

7 Despite the emerging evidence in recent years, successful  
8 implementation of clinical genomic sequencing (CGS) remains  
9 limited and is challenged by a range of barriers. These include  
10 a lack of standardized practices, limited economic assessments  
11 for specific indications, limited meaningful patient engagement  
12 in health policy decision-making, and the associated costs and  
13 resource demand for implementation. Although CGS is gradually  
14 becoming more available and accessible worldwide, large  
15 variations and disparities remain, and reflections on the  
16 lessons learned for successful implementation are sparse. In  
17 this commentary, members of the Global Economics and Evaluation  
18 of Clinical Genomics Sequencing Working Group (GEECS) describe  
19 the global landscape of CGS in the context of health economics  
20 and policy and propose evidence-based solutions to address  
21 existing and future barriers to CGS implementation. The topics  
22 discussed are reflected as two overarching themes: (1) system

1 readiness for CGS and (2) evidence, assessments, and approval  
2 processes. These themes highlight the need for health economics,  
3 public health, and infrastructure and operational  
4 considerations; a robust patient- and family-centered evidence  
5 base on CGS outcomes; and a comprehensive, collaborative,  
6 interdisciplinary approach.

7 Keywords: clinical genomic sequencing; health economics;  
8 precision medicine; global  
9 health; genomic medicine; genetic testing

10

## 11 **Background**

12 Clinical genome sequencing (CGS) has significantly changed  
13 genomic medicine and garnered global interest, owing to its  
14 ability to process large amounts of genomic data rapidly and  
15 simultaneously.<sup>1,2</sup> As a diagnostic tool in oncology, immunology,  
16 and rare diseases, CGS could enhance clinical care by offering  
17 earlier detection and reduced diagnostic odysseys, tailored  
18 treatment options, and definitive and accurate genomic  
19 etiologies and prognoses.<sup>3-8</sup> However, efforts to evaluate and  
20 improve implementation and access to CGS are complicated by the  
21 variability of health systems and funding capacities across  
22 countries.<sup>9,10</sup>

1 This commentary is an international, collaborative contribution  
2 to illustrate the global landscape of CGS in clinical  
3 applications and propose economic- and policy-focused solutions  
4 where appropriate. The authors are members of the Global  
5 Economics and Evaluation of Clinical Genomics Sequencing Working  
6 Group (GEECS), which aims to improve methodologies in assessing  
7 the value of CGS to facilitate its cost-effective and equitable  
8 implementation.<sup>11</sup> The topics covered in this commentary reflect  
9 two themes: (1) system readiness for CGS and (2) evidence,  
10 assessments, and approval processes. We discuss several key  
11 challenges and potential solutions for addressing the slow and  
12 limited uptake of CGS globally that reflect these two themes.  
13 These challenges and solutions include the lack of harmonization  
14 and standardization around genomic data, evidentiary uncertainty  
15 about CGS which requires centralized practices and policies with  
16 collaboration amongst government bodies, laboratories, health  
17 and academic institutions, and patients to create robust  
18 evidence bases and to increase patient engagement. We also  
19 consider equity and both financial constraints and incentives to  
20 support implementation of CGS and ongoing sustainability.  
21 Although some of these topics are applicable to certain  
22 countries and types of health systems, particularly in the  
23 context of economic evaluation, the general considerations

1 regarding challenges and solutions for implementing CGS are  
2 relevant in the broad context of health policy.

3

#### 4 **System Readiness for CGS**

5 *Increasing trust in CGS through review, standardization, and*  
6 *transparency*

7 It is a challenge for health systems to ensure that novel  
8 medical technologies, including CGS, are safe, effective,  
9 economically viable, and trusted by patients. In the US,  
10 concerns have emerged due to conflicting information about the  
11 limitations of genomic tests in screening for rare diseases,  
12 such as a New York Times report on the frequency and  
13 consequences of false-positive findings from non-invasive  
14 prenatal genetic tests.<sup>12</sup> These reports contributed to calls for  
15 greater review, standardization, and transparency of genomic  
16 testing through regulation.

17 Transparency of CGS could be furthered through publicly  
18 accessible genetic and laboratory test registries and regulatory  
19 and delivery system infrastructures.<sup>13,14</sup> For example, the  
20 National Institutes of Health Genetic Testing Registry (GTR) was  
21 developed to document and standardize data on registered  
22 laboratories and genetic tests.<sup>14</sup> Although regulatory oversight

1 of tests and laboratories typically falls under the jurisdiction  
2 of government agencies and professional bodies, registries such  
3 as the GTR could reveal gaps and issues in the registered tests  
4 that may prompt further inquiry and action.

5 However, increasing review and standardization of CGS can be  
6 complicated. Although the US Food and Drug Administration (FDA)  
7 regulates clinical tests, most genomic tests are laboratory-  
8 developed tests (LDTs) that often enter the market without  
9 regulatory review.<sup>15</sup> On September 29, 2023, the FDA announced its  
10 intent to provide greater oversight of LDTs through the rule-  
11 making process, with an expected final issuance in 2024.<sup>15</sup> Their  
12 rationale specifically notes that greater oversight is needed  
13 because of patient and provider mistrust about test safety and  
14 effectiveness.

15 The implications of the FDA proposal are complex and spark  
16 debate on balancing innovation and accessibility with trust in  
17 tests' safety and efficacy. Numerous responses to the proposed  
18 rules have emerged, with proponents and opponents arguing their  
19 perspectives.<sup>16</sup> These debates - and the implications if the rule  
20 is approved - are particularly relevant to CGS that are  
21 classified as LDTs. Regardless of the mechanisms used and  
22 actions taken, acceptance and trust by patients are critical  
23 aspects of CGS adoption.



1

2 *Considerations of Equity in CGS Access and Outcomes*

3 Health inequity is embedded in genomic medicine. The exclusion  
4 of minoritized populations from genomics research has resulted  
5 in disparities in genomic data across ancestral groups and  
6 subsequent repercussions in clinical care, such as higher rates  
7 of inconclusive genetic results in patients from ancestral  
8 groups outside of Europe.<sup>17,18</sup> Compounding data disparities,  
9 individuals belonging to underserved populations, including  
10 racial and ethnic minority groups, socioeconomically vulnerable  
11 groups, and rural populations, face limited access to CGS.<sup>19-22</sup>  
12 When patients in underserved population groups do receive  
13 testing, disparities in outcome-based diagnostic value and  
14 accessibility to follow-up care further perpetuate cycles of  
15 health inequity.<sup>21</sup> If not addressed, these challenges and the  
16 greater medical distrust in these populations<sup>23,24</sup> could impede  
17 the successful implementation of CGS.

18 Policymakers and other relevant parties must consider the impact  
19 on health equity when developing policies to implement and  
20 support CGS. Health economists can advance understanding of  
21 empirical impacts on equity by using equity-informative  
22 approaches to economic evaluation of CGS interventions. One type  
23 of equity-informative analysis is the distributional cost-

1 effectiveness analysis (DCEA). DCEA models the distribution of  
2 health benefits and opportunity costs across population  
3 subgroups and thus allows formal assessment of tradeoffs between  
4 efficiency and equity.<sup>25,26</sup> DCEA can inform health policy and  
5 implementation decisions, and by projecting the expected impact  
6 of CGS on total health and health equity, it can be used to  
7 monitor these outcomes as genomics research progresses. Future  
8 research is warranted to address the data and methodological  
9 challenges of using DCEA to evaluate CGS, and the acceptability  
10 and usefulness of DCEA output to policymakers. Results of DCEA  
11 should be considered alongside other social science research on  
12 attitudes and preferences for CGS among diverse and  
13 representative populations.

14

15 *Centralized, regional sequencing and institutional-level*  
16 *informatics and results disclosure*

17 Creating a diagnostic sequencing service requires significant  
18 investment in equipment and supplies, retooling of laboratories,  
19 staff training, and maintaining updated bioinformatics  
20 pipelines. Variations in services across institutions and  
21 laboratory partners, based on the patient's region of residence  
22 and insurance coverage, contribute to inconsistency and  
23 inefficiency.

1 Establishing a single high-volume sequencing laboratory within a  
2 region or payer jurisdiction with cloud-based data storage can  
3 reduce procurement, supply, and contract costs, and enhance  
4 standardized procedures for staff training and pipeline  
5 maintenance and updating.<sup>27-29</sup> An online regional accessioning  
6 system can be created where physicians can request sequencing  
7 for their eligible patients, allowing them to have blood drawn  
8 and shipped locally.<sup>30</sup> Raw results can be returned to  
9 bioinformaticians working locally with a requesting medical  
10 geneticist or specialist for clinical interpretation and  
11 reporting.<sup>31</sup> Alternatively, interpretation and reporting may be  
12 performed at a few academic health centers, and results returned  
13 to the ordering physician. Local solutions may be limited in  
14 terms of yielding economies of scale (e.g., smaller sample  
15 throughput) and may potentially be more expensive compared to a  
16 centralized system. Decisions in managing sequencing informatics  
17 would need to be considered in the context of the specific  
18 health system.

19  
20 *Understanding features for system implementation and financial*  
21 *incentives to drive uptake in practice*

22

1 System readiness for CGS in practice requires an understanding  
2 of operational and logistical considerations, including the  
3 technical platform, sample collection and preparation, and the  
4 testing site and methodologies. The future use of CGS in health  
5 systems requires (1) infrastructure for a community of practice  
6 involving health professionals in various specialties; (2)  
7 operational resources for innovation, coordination, and  
8 evaluation of testing and reporting services; and, (3) a  
9 healthcare environment integrating innovation and healthcare  
10 delivery with educational and training support.<sup>32-36</sup> The  
11 implications of these health system factors for CGS extend  
12 beyond individuals to collective societal values and needs.<sup>35,37</sup>  
13 Evidence of differential use of genetic tests amongst primary  
14 care physicians reveals lower rates of referral and testing for  
15 specific patient populations in the United States.<sup>35</sup> These  
16 findings reflect the potential for inequitable access and uptake  
17 of CGS amongst different populations and care systems that  
18 result in differential utilization of CGS. Consequently,  
19 inadequate consideration of the impacts of health system factors  
20 could affect the accessibility of CGS for specific population  
21 groups differentially. Engaging public health experts and health  
22 economists can support healthcare decision-making and develop  
23 systems for innovation and broader, more equitable use of CGS in  
24 care and preventive applications.<sup>32</sup>

1 Recognizing the financial structures of health systems and  
2 coverage policies is also necessary, as they incentivize  
3 hospital institutions to consider and negotiate price-volume  
4 arrangements to maintain revenues. The Medicare Benefits  
5 Schedule in Australia dictates a 75% rebate for fluorescence in-  
6 situ hybridization testing for EGFR-negative, non-small lung  
7 cancer patients.<sup>38</sup> This test can be performed and claimed  
8 multiple times, which might encourage higher claims than actual  
9 testing costs. This fee structure, therefore, does not optimize  
10 clinical practice and necessitates routine review and  
11 adjustments. Conversely, the Netherlands introduced a payment  
12 bundle that covers genomic tests with a fixed rebate, encouraging  
13 health institutions to consider clinical utility-driven testing  
14 strategies in balancing off CGS tests against inexpensive  
15 alternatives.<sup>39</sup> As current health technology assessment (HTA)  
16 practices can overlook how health system incentives are  
17 associated with utilization and uptake, simulation models,  
18 particularly systems dynamics, can fill this gap by analyzing  
19 time-to-treatment and total cost of care episodes under varying  
20 conditions in clinical services.<sup>40-44</sup>

21

22

23

## 1 **Evidence, Assessments, and Approval Processes**

2 *Recommendations for CGS implementation need to be evaluated for*  
3 *impact*

4 Professional societies and expert consortia have issued  
5 recommendations to guide CGS implementation, addressing  
6 processes such as test requisition, data management, and  
7 clinical follow-up.<sup>45-49</sup> However, evaluations of these  
8 recommendations are lacking due to implementation barriers,  
9 including a lack of confidence and knowledge among healthcare  
10 providers, concerns about infrastructure costs within health  
11 systems, and reluctance of payers to cover and reimburse  
12 services.<sup>22,50-53</sup> The lack of robust evaluations from multiple  
13 stakeholder perspectives can result in conflicting  
14 implementation approaches that increase risks for unintentional  
15 harm and reduce clinical utility while increasing costs to  
16 health systems.<sup>54-56</sup> For example, the American College of Medical  
17 Genetics and Genomics recommends opportunistic screening of  
18 existing genomic information for additional actionable  
19 information in a "minimum gene list" whenever whole exome or  
20 genome sequencing is conducted.<sup>57</sup> In contrast, the European  
21 Society of Human Genetics discourages opportunity screening  
22 except for the purposes of evidence generation to inform future  
23 policymaking.<sup>58</sup> Rigorous studies of CGS are needed to better

1 ensure that implementation recommendations optimize benefits and  
2 minimize risks.

3 Demonstrating the value of CGS from multiple perspectives  
4 through a combination of economic modeling, prospective trials,  
5 and real-world data analyses may be particularly important to  
6 help different stakeholders prioritize needed infrastructure.  
7 Until then, health systems would likely be wary about adopting  
8 emerging applications; payers would be reserved about covering  
9 these services;<sup>50,58,59</sup> and regulators would be cautious about  
10 approving their use.<sup>60-62</sup>

11

12 *Addressing uncertainty in decision-making - 'daring to change'*  
13 *in systems and laboratories*

14 Insurers and payers seek answers on the added value and cost-  
15 effectiveness of CGS, but estimating monetary and patient  
16 outcomes is challenging and relies on model-based economic  
17 evaluations.<sup>63,64</sup> Given the complexity and scope of  
18 implementation, fully and consistently capturing the added value  
19 is not always feasible, which may lead to uncertainty in  
20 decision-making for payers, hospitals, and laboratories. This  
21 uncertainty relates to the fact that choices needed to be made  
22 without having complete insight into all added values compared  
23 to current technologies. A decision is needed, followed by more

1 improvements and valuation of CGS in the patient journey with  
2 the data available.

3 Apart from impacts on costs and effects for society, the  
4 educational, technical, and material requirements to support CGS  
5 implementation are also substantial, and institutions may lack  
6 confidence in their financial and human resources to adopt and  
7 sustain recommendations provided by decision-makers fully.<sup>65-67</sup> To  
8 prevent further delays in patients' access to innovative  
9 technologies, discussions with payers and other relevant parties  
10 are therefore needed to transition towards more suitable  
11 assessment and adoption strategies in the face of this decision  
12 uncertainty.

13 CGS implementation and usage also require laboratories to  
14 transform their workforce and design. These changes can  
15 alleviate the financial burden to meet demand, enhance testing  
16 scope and capacity, and support ordering institutions as a  
17 valuable resource. Laboratories should consult with other  
18 stakeholders to explore solutions to address the complexities of  
19 these adjustments. Implementing CGS depends on macro-level  
20 (e.g., design, equipment) and micro-level (e.g., workforce,  
21 tasks) changes in the laboratory space, and the hope that these  
22 modifications can bring changes that cannot be empirically  
23 measured, but can, nonetheless, offer significant value.



1

2 *A unified HTA pathway and the need for life-cycle evidence*

3 Traditional HTA processes, designed for 'on/off' health system  
4 decisions and often for drug assessments, and the siloed nature  
5 of resource allocation decisions across and within systems may  
6 limit the optimization of CGS-related health and economic  
7 outcomes.<sup>68,69</sup> A unified HTA pathway with model- and data-sharing  
8 is crucial to avoid opportunity costs from uncoordinated,  
9 unstandardized, and delayed prioritization of HTA assessments.  
10 Neglecting these issues may result in structural inefficiencies,  
11 with a lack of consideration for technological changes, fiscal  
12 sustainability, and evidentiary uncertainty compromising the  
13 optimal and equitable adoption of genomic technologies.<sup>70-73</sup>  
14 Establishing a unified, life-cycle health technology assessment  
15 (LC-HTA) approach towards incremental evidence development,  
16 based on real-world data, could be one approach to facilitating  
17 CGS implementation.<sup>68,71</sup> LC-HTA is defined as standardized data  
18 and methods that enable iterative and ongoing evidence  
19 appraisals throughout technology life-cycles as part of a  
20 learning healthcare system.<sup>68</sup> Its framework incorporates standard  
21 HTA concepts with on-market evidence that follows initial  
22 regulatory authorization and conditional health system  
23 reimbursement and risk-based pricing strategies based on value

1 of information analysis and payers' risk tolerance for increased  
2 flexibility.<sup>71</sup> Managed and time-limited access in reimbursing  
3 expensive therapies is central to LC-HTA and has been piloted in  
4 many countries worldwide, including publicly funded healthcare  
5 systems, such as the UK, Canada, and Australia, and primarily  
6 private systems such as the US.<sup>74-76</sup> Oncology remains the most  
7 common indication for managed access, and to date, agreements  
8 have yet to consider CGS access.

9 Achieving LC-HTA in an international context requires capacity-  
10 building and investment in learning healthcare infrastructure to  
11 enable ongoing monitoring, evaluation, and deliberation. It also  
12 necessitates wide stakeholder engagement for endorsement,  
13 collaborative evidence generation, and cross-jurisdictional data  
14 sharing. LC-HTA deliberation processes should be embedded into  
15 health systems to adapt to the evolving field of genomic  
16 medicine. With proper design, these efforts could mitigate  
17 uncertainty and ensure value-centered and cost-effective CGS  
18 implementation in clinical practice.

19  
20 *Building a robust patient-centered evidence base on CGS outcomes*  
21 *that integrates patient perspectives and preferences*

22 Beyond system readiness is the need for high-quality genetic  
23 testing services that value patient and family perspectives and

1 preferences - with patients and families being informed,  
2 respected, and involved in their care in meaningful ways  
3 throughout their clinical journey.<sup>77,78</sup> This journey involves  
4 numerous relationships and interactions, spanning diagnostic  
5 assessments, genomic testing, and complex decision-making  
6 processes. Therefore, effective, efficient, and equitable CGS  
7 implementation requires meaningful engagement of patients and  
8 families that facilitates active involvement and improvement in  
9 their care.<sup>79,80</sup>

10 The current evidence base on CGS outcomes focuses on a narrow  
11 subset of measures, such as diagnostic yield, rather than  
12 outcomes recommended by HTA agencies, such as quality-adjusted  
13 life-years (QALY).<sup>81,82</sup> Studies generating evidence on the health  
14 outcomes of CGS using metrics such as the QALY would  
15 significantly improve the evidence base for implementation. That  
16 said, preference-based health-related quality-of-life  
17 instruments commonly used to generate QALY weights, such as EQ-  
18 5L, might not fully capture the patient-related benefits of  
19 CGS.<sup>83</sup> To date, few studies have utilized instruments that  
20 thoroughly assess psychosocial outcomes or investigated the  
21 broader impacts on patients' and families' wellbeing (e.g., via  
22 non-clinical routes). However, evidence suggests these outcomes  
23 are highly valued by patients and families, along with access to  
24 genomic testing and a timely diagnosis.<sup>84,85</sup> The complexity of

1 genomic information and actionability creates challenges for its  
2 valuation, necessitating additional consideration for non-health  
3 outcomes.<sup>86</sup> The application of approaches, such as cost-  
4 consequences analysis or multi-criteria decision analysis -  
5 which allow evidence on QALY outcomes to be considered alongside  
6 broader measures of patient benefit - should be encouraged.  
7 Regardless of which measures are used to quantify the benefits  
8 of CGS for patients and their families, a coordinated global  
9 effort is required to ensure a multifaceted, robust evidence  
10 base on CGS outcomes. Data collection should be harmonized where  
11 possible to ensure sufficient data are collected, keeping in  
12 mind, for example, relatively small rare-disease  
13 populations.<sup>81, 87</sup>

14

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